



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street
New York, New York 10007*

May 7, 2019

BY ECF AND HAND DELIVERY

The Honorable Naomi Reice Buchwald
United States District Judge
United States Courthouse
500 Pearl Street, Courtroom 21A
New York, NY 10007

*Re: Am. Soc'y for the Prevention of Cruelty to Animals v. The Animal and Plant
Health Inspection Serv., and the U.S. Dep't of Agriculture,
No. 19 Civ. 03112 (NRB)*

Dear Judge Buchwald:

This Office represents defendants the Animal and Plant Health Inspection Service and the United States Department of Agriculture (collectively, the "Government") in the above-referenced case brought by the American Society for the Prevention of Cruelty to Animals ("Plaintiff"), pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552. I write respectfully pursuant to Part I.E of the Court's Individual Practices to request a two-week extension of the Government's time to respond to the complaint in this matter, from May 10 to May 24, 2019. Plaintiff consents to this request.

On April 8, 2019, Plaintiff filed the complaint in this action. *See* Dkt. No. 1. This Office received a copy of the summons and the complaint on April 10, 2019. *See* Dkt. No. 8.

Pursuant to 5 U.S.C. § 552(a)(4)(C), the Government's response to the FOIA claims alleged in the complaint is currently due on May 10, 2019. We make this request because the undersigned was out of the office on vacation from April 15 until April 22, 2019, and because the complaint is eighty pages long such that preparing a response will be time consuming. This is the Government's first request for an extension, and, as noted, Plaintiff consents to this request.

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I thank the Court for its consideration of this request.

Respectfully submitted,

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cc: All counsel of record (via ECF)